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October 14, 2022

(VIA ECF)

Hon. John G. Koeltl
United States District Judge
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

APPLICATION GRANTED
SO ORDERED

10/15/22 
John G. Koeltl, U.S.D.J.

Re: 1199SEIU United HealthCare Workers East v. PSC Community Services et al
Case No. 1:20-cv-03611-JGK

Dear Judge Koeltl:

Along with TakeRoot Justice, this office represents Epifania Hichez, Carmen Carrasco, and Seferina Acosta ("Hichez Plaintiffs"), who are Plaintiffs in the New York State court action, Hichez v. United Jewish Counsel of the East Side Home Attendant Service Corp., pending before the Supreme Court of the State of New York, County of New York, under Index No. 653250/2017.

We write with UJC's consent to request that the Court extend Hichez Plaintiffs' deadline to object to UJC's proposed injunction from October 17, 2022 until October 19, 2022. On October 11, 2022, the Court granted UJC's motion for a preliminary injunction. The Court's order required UJC to submit a proposed preliminary injunction by October 13, 2022 and permitted Hichez Plaintiffs to object by October 17, 2022. UJC timely submitted its proposed injunction. However, I am observing the Jewish holidays on October 17 and 18, and therefore respectfully request an extension until October 19, 2022.

Thank you for your consideration of this matter.

Respectfully submitted,
/s/
Michael Taubenfeld, Esq.